

**CATAHOULA PARISH SCHOOL BOARD**

**Emails Between NAACP and Board Counsel**

**Exhibit A**

**From:** Robert Hammonds  
**Sent:** Friday, September 6, 2019 12:02 PM  
**To:** 'Rabinowitz, Jessica'; John Blanchard; Pamela Dill  
**Cc:** Miller, Viona J.; 'Phillips, Colleen (CRT)'; Tayman, Kyle; 'Ronald R. Lofton'  
**Subject:** RE: Activity in Case 1:69-cv-14430-RGJ U S A v. Catahoula Parish, School Board et al Status Report [IWOV-ACTIVE.FID105444453]

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Jessica – Pam is traveling again today so I am responding on her behalf.

We are pleased to hear that you are encouraged by the plan of action recently filed with the Court. The School Board, the Superintendent, and his staff have worked very hard (with limited funding) to address the concerns about Block High School raised by community members, and they were proud to “show off” the facility renovations there in the two open houses at the school conducted in early August. We assume that representatives of your client were present, and Superintendent Lofton reports that he has received only positive feedback.

With regard to your specific requests, we would advise as follows. The “mold reports” will be forwarded to you in a separate email today. We do not have a copy of “the 2019 budget”, but it is available for inspection during regular working hours at the Catahoula Parish School Board office. The annual desegregation report will be filed on or about October 15, 2019 and will be filed in the record. We see no purpose in cluttering the suit record in this case with reports and other communications between the parties to this litigation – the Catahoula Parish School Board and the United States.

With regard to the site visits next week, they were requested by legal representatives of the United States and will be conducted only with those representatives. If members of the NAACP would like to tour schools, they can schedule an appointment with Superintendent Lofton to do so at a later time. As previously noted, they have already had the opportunity to visit Block High School.

We do not understand procedurally how an amicus limited by court order to being able to file a brief “on the issue of the court’s potential appointment of a special master” can “file a formal request with the court” to participate in site visits but, if you do file such “request”, please indicate the opposition to it by the School Board.

Hope this addresses all of the matters raised in your email of September 5, 2019.

Robert L. Hammonds, Esq.  
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**From:** Rabinowitz, Jessica <JRabinowitz@goodwinlaw.com>  
**Sent:** Thursday, September 5, 2019 4:32 PM  
**To:** Robert Hammonds <rhammonds@hamsil.com>; John Blanchard <jblanchard@hamsil.com>; Pamela Dill <pdill@hamsil.com>  
**Cc:** Miller, Viona J. <VMiller@goodwinlaw.com>; 'Phillips, Colleen (CRT)' <Colleen.Phillips@usdoj.gov>; Tayman, Kyle <KTayman@goodwinlaw.com>  
**Subject:** RE: Activity in Case 1:69-cv-14430-RGJ U S A v. Catahoula Parish, School Board et al Status Report [IWOV-ACTIVE.FID105444453]

Pam –

I tried calling you again earlier today to discuss this matter and our below request for records. In light of the parties' recent August 30<sup>th</sup> plan of work that was recently adopted by the Court, we reiterate our prior requests and additionally ask the following from the School Board:

1. Please provide copies of any mold report(s) and the 2019 budget
2. We request that a representative(s) for the NAACP be present at the site visit scheduled for September 9-10
3. We request that all copies of the reports referenced in the plan and all papers implementing the plan be filed with the court going forward so that they are a part of the public record.

We are encouraged by the parties' progress and the proposed plan of work. However, we would like to remain involved as progress continues, as the Court envisioned the NAACP's role in its order following the March 20<sup>th</sup> hearing. In addition, as the parties represented in their August status report, the NAACP intends to provide community feedback to include in the parties' filings with the court. In order to ensure that everyone (including the court) has all necessary information and stays fully informed, we require access to the requested information and permission to accompany the site visit.

Please advise if you are agreeable to the above. In light of the approaching date of the site visit, we intend to file a formal request with the court tomorrow if we do not hear from you by then. I spoke to Colleen earlier who advised that the DOJ does not oppose the request, but they are not in the position to provide it without your consent.

We look forward to your response.  
Jessie